

Message

---

**From:** Zapata, Cesar [Zapata.Cesar@epa.gov]  
**Sent:** 8/22/2019 6:56:40 PM  
**To:** Kler, Denis [Kler.Denis@epa.gov]; Dressler, Jason [Dressler.Jason@epa.gov]  
**Subject:** RE: Southern Natural Gas NSPS Applicability Request for mainline valve

Thank you Jason.

César A. Zapata  
Acting Chief  
Air Enforcement Branch  
United States Environmental Protection Agency, Region 4

---

**From:** Kler, Denis <Kler.Denis@epa.gov>  
**Sent:** Thursday, August 22, 2019 9:25 AM  
**To:** Dressler, Jason <Dressler.Jason@epa.gov>; Zapata, Cesar <Zapata.Cesar@epa.gov>  
**Subject:** FW: Southern Natural Gas NSPS Applicability Request for mainline valve

Jason and Cesar,  
Attached are the documents we have on the main line valve. The power point presentation that the company gave in June 2019 is on page 89 – 101 of the Thomaston EPA OOOOa RecordsRequest document. In the presentation the company provides some information about the leak but the company did not provide any documentation or calculations to substantiate the claims. Let me know if you have any questions.  
Denis

Denis B. Kler  
Office of the Regional Administrator R4  
Enforcement and Compliance Assurance Division  
Air Enforcement Branch  
Air Section 1  
Phone: 404-562-9199

**CONFIDENTIALITY NOTICE:**

This electronic message, including attachments, may contain information that is proprietary, privileged, or confidential, and is exempt from disclosure. If you are not the intended recipient of this message, you may not disclose, forward, distribute, copy, or use this message or its content. If you have received this communication in error, please notify the sender immediately by electronic mail and delete the original message and all the copies from your system. Thank you.

---

**From:** McNeal, Dave <Mcneal.Dave@epa.gov>  
**Sent:** Monday, July 15, 2019 9:26 AM  
**To:** Kler, Denis <Kler.Denis@epa.gov>; Russo, Todd <Russo.Todd@epa.gov>; Dressler, Jason <Dressler.Jason@epa.gov>; Groendyke, Todd <Groendyke.Todd@epa.gov>; Patel, Shilpa <patel.shilpa@epa.gov>  
**Cc:** Davis, Amber <Davis.Amber@epa.gov>; Lusky, Katy <Lusky.Kathleen@epa.gov>; Radford, Nicole <Radford.Nicole@epa.gov>  
**Subject:** RE: Southern Natural Gas NSPS Applicability Request for mainline valve

The two documents we received from Kinder Morgan are attached.

David McNeal  
EPA Region 4

---

**From:** Kler, Denis

**Sent:** Monday, July 15, 2019 8:56 AM

**To:** Russo, Todd <[Russo.Todd@epa.gov](mailto:Russo.Todd@epa.gov)>; McNeal, Dave <[Mcneal.Dave@epa.gov](mailto:Mcneal.Dave@epa.gov)>; Dressler, Jason <[Dressler.Jason@epa.gov](mailto:Dressler.Jason@epa.gov)>; Groendyke, Todd <[Groendyke.Todd@epa.gov](mailto:Groendyke.Todd@epa.gov)>; Patel, Shilpa <[patel.shilpa@epa.gov](mailto:patel.shilpa@epa.gov)>

**Cc:** Davis, Amber <[Davis.Amber@epa.gov](mailto:Davis.Amber@epa.gov)>; Lusky, Katy <[Lusky.Kathleen@epa.gov](mailto:Lusky.Kathleen@epa.gov)>; Radford, Nicole <[Radford.Nicole@epa.gov](mailto:Radford.Nicole@epa.gov)>

**Subject:** RE: Southern Natural Gas NSPS Applicability Request for mainline valve

Todd,

I believe Nikki and I attended a meeting with the company and EPA on June 11, 2019, to discuss this issue. As a result of that meeting, the company was going to provide us with some additional information. I do not believe the company has provided the EPA with the requested information.

Best,

Denis

Denis B. Kler

Office of the Regional Administrator R4

Enforcement and Compliance Assurance Division

Air Enforcement Branch

Air Section 1

Phone: 404-562-9199

**CONFIDENTIALITY NOTICE:**

This electronic message, including attachments, may contain information that is proprietary, privileged, or confidential, and is exempt from disclosure. If you are not the intended recipient of this message, you may not disclose, forward, distribute, copy, or use this message or its content. If you have received this communication in error, please notify the sender immediately by electronic mail and delete the original message and all the copies from your system. Thank you.

---

**From:** Russo, Todd

**Sent:** Monday, July 15, 2019 7:45 AM

**To:** McNeal, Dave <[Mcneal.Dave@epa.gov](mailto:Mcneal.Dave@epa.gov)>; Dressler, Jason <[Dressler.Jason@epa.gov](mailto:Dressler.Jason@epa.gov)>; Groendyke, Todd <[Groendyke.Todd@epa.gov](mailto:Groendyke.Todd@epa.gov)>; Patel, Shilpa <[patel.shilpa@epa.gov](mailto:patel.shilpa@epa.gov)>; Kler, Denis <[Kler.Denis@epa.gov](mailto:Kler.Denis@epa.gov)>

**Cc:** Davis, Amber <[Davis.Amber@epa.gov](mailto:Davis.Amber@epa.gov)>; Lusky, Katy <[Lusky.Kathleen@epa.gov](mailto:Lusky.Kathleen@epa.gov)>

**Subject:** RE: Southern Natural Gas NSPS Applicability Request for mainline valve

Denis – please see below as it pertains to NSPS Subpart OOOOa. Is this something that we need more information about since it's Subpart OOOOa related?

Shilpa and Todd - Please see below. I assume this does not pertain to the NESHAP Subpart 6B facilities you are developing. Please let me know.

Regards,

Todd Russo

U.S. EPA Region 4

Air Enforcement Branch/Air Section 2

Enforcement and Compliance Assurance Division

Tel: (404) 562-9194

CONFIDENTIALITY NOTICE: This message and any attachments from the U.S. Environmental Protection Agency may contain CONFIDENTIAL and legally protected information. If you are not the addressee or intended recipient, please do

not read, print, copy, use or disclose this communication to others; also, please notify the sender by replying to this message, and then delete it from your system. Thank you.

---

**From:** McNeal, Dave

**Sent:** Thursday, July 11, 2019 10:45 AM

**To:** Dressler, Jason <[Dressler.Jason@epa.gov](mailto:Dressler.Jason@epa.gov)>; Russo, Todd <[Russo.Todd@epa.gov](mailto:Russo.Todd@epa.gov)>

**Cc:** Davis, Amber <[Davis.Amber@epa.gov](mailto:Davis.Amber@epa.gov)>; Lusky, Katy <[Lusky.Kathleen@epa.gov](mailto:Lusky.Kathleen@epa.gov)>

**Subject:** Southern Natural Gas NSPS Applicability Request for mainline valve

***INTERNAL DELIBERATIVE MATERIAL DO NOT RELEASE UNDER FOIA***

I'm sending this email because we received an applicability determination request that has potential enforcement implications. A summary of basic facts associated with the request is provided below:

## **Ex. 5 Deliberative Process (DP)**

I'll be working with the Office of Air Quality Planning and Standards to resolve the applicability of Subpart OOOOa to the mainline valve at the Thomaston Compressor Station. If you have any questions about the status of my review, let me know.

David McNeal  
EPA Region 4  
404-562-9102